



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

August 24, 2016

Ms. Stephanie Rice, Project Lead
GMT2 Scoping Comments
Bureau of Land Management
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513

Dear Ms. Rice:

The U.S. Environmental Protection Agency (EPA) is providing comments in response to the July 29, 2016 Federal Register Notice of Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for the Alpine Satellite Development Plan For the Proposed Greater Mooses Tooth Unit 2 (GMT2) Development Project in the National Petroleum Reserve-Alaska (EPA Project #04-005-BLM). Our review of the NOI was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the Draft SEIS for the proposed project will consider the potential environmental impacts of the proposed action and the adequacy of the information in the EIS. We have enclosed a copy of the *EPA's Section 309 Review: the Clean Air Act and NEPA*, which provides further elaboration of our EIS review responsibilities.

We will also take this opportunity to respond to the Bureau of Land Management's request for cooperating agencies to identify themselves at this time. As with the original Alpine Satellites (ASDP) and the GMT1 Development Project SEIS's, we continue to have an interest in the development of new oil and gas facilities in the Arctic and responsibility to implement our authorities under the applicable environmental statutes, including Section 404 of the Clean Water Act, on the North Slope. We believe our expertise in Section 404, NEPA, and in working with North Slope tribal governments will benefit the GMT2 SEIS. Therefore, we request to serve as a cooperating agency on the Alpine Satellites Development Plan GMT2 SEIS. The level of our involvement will depend on resources available at the time meetings, phone calls, and reviews are scheduled. As with GMT1, we recognize this project is subject to the June 23, 2011 Interagency Memorandum of Understanding on Air Quality For Oil and Gas Decisions on Federal Land. We look forward to continuing to work with the BLM and other federal partners in implementing the MOU.

The purpose of the SEIS is to supplement the 2004 ASDP Final EIS and evaluate new circumstances and information that have arisen since the ASDP Final EIS, as well as to address any changes in the proposed development plan for GMT2. The development would occur at the proposed GMT2 pad and connect by road and pipeline to the GMT1 development within the National Petroleum Reserve-Alaska. The proposed project will support up to 48 wells and includes the construction, operation, and maintenance of a drill site and pad, access road, pipelines, and ancillary facilities at GMT2. We also note, unlike GMT1, GMT2 does not involve any creek or stream crossings and is outside the Colville River Special Area. We also recognize the proposed project is farther from the community of Nuiqsut and existing pipeline infrastructure will be used for a portion of the route (GMT1 pipeline, cables, Arctic Slope Regional Corporation Mine Site, CD-1, Central Processing Facility, etc.) The SEIS will incorporate new information from ongoing resource studies on hydrology, birds, caribou, vegetation, wetlands, and subsistence use.

The preferred alternative identified by the SEIS must comply with the 404(b)(1) guidelines under Section 404 of the Clean Water Act and must constitute the least environmentally damaging practicable alternative (LEDPA). Therefore, we encourage the applicant, the BLM and the U.S. Army Corps of Engineers to work closely to develop a draft 404(b)(1) analysis for inclusion in the Draft SEIS. This information should be used to identify the preferred alternative, which should also be the LEDPA.

Finally, the NOI states since the Alpine Satellites EIS in 2004, the study of climate change and its potential effects has advanced considerably and new data resulting from this research will be included in the environmental analysis. We recommend the BLM follow the approach outlined by the Council on Environmental Quality's recently issued final guidance regarding the analysis of greenhouse gas (GHG) emissions and climate change in NEPA documents¹ for the GHG and climate change analysis in the Draft SEIS. Specifically, we recommend BLM include in the Draft SEIS an estimate of the direct and indirect GHG emissions that would be caused by the proposed action and an analysis of reasonable alternatives and/or practicable measures to avoid, reduce, or compensate for GHG emissions that would be caused by the proposed action. In addition, we recommend that GHG reduction measures and improvements to the proposed action's resilience to projected climate change scenarios be considered in project design. We recommend the Draft SEIS make clear whether commitments have been made to measures to avoid, reduce, or compensate for GHG emissions and/or adapt to climate change.

¹Council on Environmental Quality Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews (August 1, 2016). https://www.whitehouse.gov/sites/whitehouse.gov/files/documents/nepa_final_ghg_guidance.pdf

We appreciate the opportunity to participate early in the planning process for this project and will continue to work closely as a cooperating agency with the BLM to develop the Draft SEIS. Please contact me at (907) 271-6324 or at curtis.jennifer@epa.gov with any questions regarding our comments.

Sincerely,



Jennifer Curtis, NEPA Reviewer

Office of Environmental Review and Assessment

Enclosure:

1. EPA's Section 309 Review: the Clean Air Act and NEPA

